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December 27, 2019

Via ECF

Hon. Judge Andrew L. Carter
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Jacqueline Gray v. Mid-Bronx CCRP Early Childhood Center, Inc. et al
Index No. 18-CV-7934 (ALC) (OTW)

Dear Hon. Judge Carter:

This office is co-counsel in our representation of Defendants in the above referenced matter, and I write to respectfully request an extension of the deadline to submit a settlement agreement and motion for court approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015). The current deadline is December 27, 2019.

As I mentioned in my letter to Your Honor on December 13, although the parties reached an agreement in principle to resolve this case, we needed additional time to address an unanticipated challenge that arose. Unfortunately, given the holidays, we have been unable to finalize our agreement, despite our best effort and diligence. We respectfully request another extension – until January 10, 2019. This is the third request for an extension. I have conferred with counsel for Plaintiffs, and he consents to this request. Should the court grant the parties' request, no other future deadlines would be affected. Finally, we do not anticipate that any further extensions will be necessary.

Thank you for your time and consideration regarding this matter.

Very truly yours,

/s/
Joshua Beldner

CC: VIA ECF
Counsel for all parties

SO ORDERED
Andrew L. Carter, Jr.

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: December 27, 2019